

Anthony DeFranco CZ-3518
10745 Route 18
Albion, Pa. 16475-0002

FILED

Honorable Susan Paradise Baxter
U.S. Courthouse
P.O. Box 1820
Erie, Pa. 16501

06 APR 26 A10:38

CLERK
U.S. DISTRICT COURT

April 21, 2006

Re: *DeFranco v. Wolfe, et al., 04-230-E LETTER BRIEF*

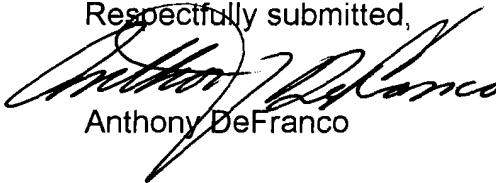
Honorable Judge Baxter:

I have been provided with the un-redacted vote sheets involving the z-code. The defendants' have failed to provide the z-code policy itself. As argued, the "policy" itself is being challenged and without it I will not be able to effectively argue it.

Also, I received a letter from counsel indicating that they are objecting to a large portion of the papers I requested in discovery. As the Court is aware, the defendants' have allowed my viewing of these documents and they should be provided to me since they have waived my viewing of them. Moreover, I should not have to "blindly" pay for papers that I cannot see. By giving me some of the documents does not help my case. I object to this procedure and request the papers in their entirety and not forced to pay for anything until I see it.

Your Honor, lastly, I want to make the Court aware and the record to reflect that over the past few months I have been subjected to harassment by the defendants through security. Specifically, my cell has been shook down many times. Once my typewriter confiscated and returned damaged as witnessed by staff. Legal material left in a secure part of the library was shredded by security and as recent as 4/2/06, I was locked inside a dorm room for 2 hours while security searched my cell for some written note. Interestingly, I was found to be innocent and never given a misconduct. I don't know if these are concerted efforts to create a security reason to transfer me or simple harassment. I wanted the Court made aware of these events.

Respectfully submitted,


Anthony DeFranco

C; Attorney General's Office
Enc./letter to Def.'s

Anthony DeFranco CZ-3518
10745 Route 18
Albion, Pa. 16475-0002

Attorney General's Office
564 Forbes Ave., Manor Complex
Pittsburgh, Pa. 15219

April 21, 2006

Re: DeFranco v. Wolfe, No. 04-230-E

Dear Attorney Friedline:

This will acknowledge receipt of your correspondence date 4/19/06 and enclosed, unredacted vote sheets. Additionally, your itemized letter which indicated the portions of my medical/psychiatric file you now object to providing. Because you have previously waived my viewing these documents, I am requesting to be provided a copy of them. Your assertion that they could be used to manipulate the system is speculative at best (plus I have read them per your permission). I refuse to sign any payment for any documents unless and until I see what I am receiving. Moreover, I wanted the complete papers; by giving me only bits and pieces would do me little good. I object to this. It was my specific understanding that the copies would be made in front of me so I knew what was being copied. Right now I have no clue. And I refuse to pay for things I don't need or don't know what they say. As stated, by giving me pieces of what I asked for is not helping me and I should not be compelled to pay for them like that. Also, it is still my assertion that no one should be able to access my psychiatric file unless I expressly intend to use it or waive it. I have done neither yet it was reproduced for others to view.

You still have failed to provide the z code policy used by the DOC. As stated, this is material to my case and I need it. Please let me know what you are going to do about this.

Last, as you are aware, I have mailed you numerous interrogatories and my second request for the production of documents. There has been no reply to any of this. Also, I did not gain access to my inmate file located inside my counselors office. This file is independent to the DC-15. Your attention to these matters are very much appreciated. I look forward to hearing from you.

Very truly yours,

CC: Judge Baxter
Anthony DeFranco